



Daniel Horwitz &lt;daniel.a.horwitz@gmail.com&gt;

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**Deposition of Defendant Shawna Curtis**

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**Polly, Erin Palmer** <Erin.Polly@klgates.com>

Wed, Aug 3, 2022 at 8:58 AM

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We're fine if you really want to depose Shawna Curtis, but we don't understand why it's necessary. She wasn't employed by CoreCivic on December 8, 2020, she didn't work at Trousdale on December 8, 2020, and she didn't complete the classification assessment of Tymothy Willis on December 8, 2020. You don't contest this because you ask us to identify the individual who "actually made this classification decision." It seems like an unnecessary deposition.

We understand that April Holmes initiated Willis' reclassification in the system and conducted the hearing as the chairperson. Her name is on the form as HOLMAP01. EPP

HOLMAP01

TENNESSEE DEPARTMENT OF CORRECTIONS  
CLASSIFICATION CUSTODY ASSESSMENT FORMDATE: 12/08/2020  
TIME: 13:56:58  
PAGE: 1

TOMIS ID: 00574845 WILLIS, TYMOTHY B. \_\_\_\_\_

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